Connected products — data disclosure (DS3)

Digital Hand Shower products used with the Digital Hand Shower app · Data Act (EU) 2023/2854 Art. 3(2)–(3)

Document	Data disclosure DS3, version 1.0 (17.11.2026)
Applies to	Oras and HANSA Digital Hand Shower products used with the Digital Hand Shower app (iOS "Digital Hand Shower", Android "Digital Hand Shower DHS"); covers the product, the app and the related backend service
Describes	the Digital Hand Shower app version 2.0.7 and the backend service as deployed in 11/2026; applies to every handshower firmware using the same Bluetooth® protocol, including earlier Amphiro-branded units; revised when the app or the service changes
Brands	Oras Group, Oras, HANSA
Data holder	Oras Oy, Isometsäntie 2, FI-26100 Rauma, Finland

ITEM	STATEMENT
Data generated	Per-shower summaries measured by the handshower (water volume, flow rate, average temperature, estimated heating energy, duration and water-running time, number of breaks, shower counter); handshower identity and settings (Bluetooth® address, brand, firmware and hardware revision, nickname, shower goal, LED settings); account data entered by the user (e-mail address, password, optional profiles with name and age, preferences); app and phone details sent with each request (app version, operating system, phone model); crash diagnostics; data derived by the service (per-device averages and trends, achievements, community comparisons, downloadable reports).
Format, volume, frequency	Structured per-shower summary records of about 300 bytes, uploaded in batches by the app when the phone is near the handshower with the app running and online; typically a few tens of kB per handshower per month. Completed showers only — no continuous sensor stream is stored. The handshower itself keeps roughly its last 300 showers without any link to a person; the phone keeps a local copy of the history.
Continuous / real-time	No — live readings are shown in the app during a shower; only the completed summary is transmitted, when the app next connects to the handshower.
Storage, retention	On the handshower (anonymous) and on the user's phone; in the Oras backend service hosted on Microsoft Azure in the EU (West Europe). Retention periods (set 11/2026): shower data for as long as the handshower is registered to the account (deleted with it); account, profile and device data for the active relationship plus 90 days after account closure; backups 35 days; application logs 3 months. Automatic deletion after these periods is being implemented; until then data is deleted on request.

ITEM	STATEMENT
Access, retrieval, erasure	In the app: shower history, statistics, goals and comparisons, and a download of the shower history as a spreadsheet (XLSX) per handshower and period (app 2.0.7 or later), free of charge. Removing a handshower in the app deletes it and its shower records from the service immediately. Account deletion and an export of account and profile data are not yet available in the app; both on request via the contact below, carried out by Oras Group.
Use by Oras Group	Providing the service (account, device registration, history synchronisation, export), in-app statistics and community comparisons, crash diagnostics for maintenance and support, account-recovery e-mails — within the terms of service (Art. 4(13)); any further use only as allowed by the terms of service and the privacy policy.
Third parties	Processors only: Microsoft Azure (hosting and database, EU West Europe), Google Firebase Crashlytics (crash reports from the app, which may include device and error context), Twilio SendGrid (account-recovery e-mails), Papertrail / Azure Application Insights (application logs). No advertising or analytics networks, no social sign-in. Sharing at the user's request on fair, reasonable and non-discriminatory terms (Art. 5); the user can end it at any time.
Data holder, contact	Oras Oy operates the service. Requests on access, sharing and deletion: the consumer support of the brand website (oras.com, hansa.com), which forwards them to the service team.
Personal data	An account (e-mail address) is required to use the app; shower data is linked to the account and the registered handshower, not to a named household member. Several accounts can register the same handshower. Processed under the app's terms of service and privacy policy (GDPR).
Trade secrets, complaints	Trade-secret data may be subject to confidentiality measures (Art. 4(6)). Complaint with the competent authority of the user's Member State (Art. 37). Questions: compliance.orasgroup.com.

Information under Art. 3(2)–(3) of Regulation (EU) 2023/2854 for the products, app and service above, as known at the issue date; revised when the app or the service changes. Security information under Regulation (EU) 2024/2847 will be added before 11.12.2027. Not a Declaration of Conformity.